

St Tammany Parish Mosquito Control

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As an entomologist for St. Tammany Mosquito Control for the past 24 years, I read the Interim Statement & Guidance on Application of Pesticides to Waters of the U.S. in Compliance with FIFRA with great interest. I believe that this interpretation is based on valid scientific information & is extremely important in furthering our abilities to protect the citizens of this country against the many problems that could occur should the mosquito control industry find itself tied up in legal games that have to do with permits for the treatment of an area. As anyone in the industry knows, a mosquito population can be spawned within days of a rain. This occurrence could never be predicted in a week, yet less the 6 months it would take to obtain a permit.

During these past 24 years, I have seen the industry turn from primarily using adulticides to the use of a more Integrated Pest Management strategy. This strategy includes the use of biological larvicides which are more species specific. As a member of the AMCA & LMCA which have always stressed the importance of IPM as well as the importance of following all federal and state rules & regulations, I was floored when *Headwater, Inc. v. Talent Irrigation District* came to my attention. Our district has over 300 miles of open septic ditches, 60,000 acres of marshland & thousands of acres of breeding woodlands & domestic areas. A great majority of these areas are proven to be prolific breeding spots for at least 38 species of mosquitoes, on a year round basis. In addition, in 2002, West Nile Virus caused the death of 4 individuals & serious illness in another 36. If we had been required to get a NPDS permit everytime we treated our ditches, the spread of this disease would have been catastrophic. Through the years, we have tried to rely more on biological larvicides to stem the rampant mosquito problems that we have in our district. These products are proven to be environmentally friendly and the safest materials available in our industry. However, we also know that, in our case, we cannot entirely rely on these products. Thus, we must also use adulticides such as naled & resmethrin in order to make life in this area bearable. These chemicals have also been proven to be extremely safe when applied according to the label, breaking down in the environment within hours of application.

As professionals in mosquito control, we continue to educate ourselves on all available products & practices to insure that we provide the safest & most up to date services to our district, following all federal & state laws. There are probably no greater lovers of the environment than we who have chosen to work in the mosquito control field. Therefore, I wish to state that your Interim Statement & Guidance on Application of Pesticides to the Waters of the U.S. is extremely important & is backed by many years of sound, scientific studies & practice to prove that "the application of a pesticide to the waters of the U.S. , consistent with all relevant requirements of FIFRA does not constitute the discharge of a pollutant in order to control pests such as mosquito larvae, & aerial control of mosquitoes." There have been a myriad of studies proving that these materials are safe, and non-persistent when used according to the label.

It is our experience that too many of the so-called "environmentalists" have used fear & hearsay to proceed with their agenda. We wish only to use sound, scientific practices to insure the safety & well being of the people who live in our district. Please do so when preparing the final statement regarding your interpretation.

Sincerely,

Viki Taylor
Supervisory Entomologist